

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA, *et al.*,

Plaintiffs,

v.

AMERICAN AIRLINES GROUP INC.
and
JETBLUE AIRWAYS CORPORATION,

Defendants.

Civil Action No.: 1:21-cv-11558-LTS

**JOINT MOTION FOR ENTRY OF AN ORDER GOVERNING DISCOVERY OF
ELECTRONICALLY STORED INFORMATION**

Plaintiffs, the United States of America and the States of Arizona, California, Florida, Massachusetts, Pennsylvania, Virginia, and the District of Columbia (collectively, “Plaintiffs”), and Defendants, American Airlines Group Inc. and JetBlue Airways Corporation (collectively, “Defendants,” and together with Plaintiffs, the “Parties”) respectfully submit to the Court this Joint Motion for Entry of an Order Governing Discovery of Electronically Stored Information.

Pursuant to paragraphs 13, 14, and 16 of the Scheduling and Case Management Order, ECF No. 76, and in accordance with Rule 26 of the Federal Rules of Civil Procedure and Rule 34.1 of the Local Civil Rules, Plaintiffs and Defendants met and conferred by telephone on at least October 29, 2021, December 28, 2021, and March 17, 2022, and exchanged various emails and drafts before and after the telephonic meet and confers. Plaintiffs and Defendants respectfully request that the Court enter the proposed attached Proposed Order Governing Discovery of Electronically Stored Information reflecting the Parties’ agreement.

Dated: June 8, 2022

Respectfully submitted,

/s/ Sarah P. McDonough

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CERTIFICATE OF SERVICE

I certify that on June 8, 2022 I filed the foregoing document with the United States District Court for the District of Massachusetts using the CM/ECF system, and caused it to be served on all registered participants via the notice of electronic filing (the “NEF”).

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